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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Case No. M 3:07-md-1827 SI; MDL 1827
Individual Case No. 3:10-cv-0117 SI

This Document Relates To Individual Case No.:
3:10-cv-0117 SI

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING FACT
DISCOVERY CUTOFF**

ELECTROGRAPH SYSTEMS, INC.;
ELECTROGRAPH TECHNOLOGIES, CORP.

Honorable Susan Illston

Plaintiffs,

v.

EPSON IMAGING DEVICES CORPORATION,
et al.

Defendants.

Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies, Corp. (collectively,
“Electrograph”) and Defendants Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi Electronic Devices
(USA), Inc., Epson Imaging Devices Corporation, Epson Electronics America, Inc., Sharp

Corporation, Sharp Electronics Corporation, Toshiba Corporation, Toshiba America Electronic Components, Inc., Toshiba America Information Systems, Inc., Toshiba Mobile Display Co., Ltd., LG Display Co., Ltd., LG Display America, Inc., AU Optronics Corporation, AU Optronics Corporation America, Samsung Electronics Company, Ltd., Samsung Semiconductor, Inc., Samsung Electronics America, Inc. and HannStar Display Corporation (collectively, “Stipulating Defendants”), hereby stipulate as follows:

STIPULATION

WHEREAS, fact discovery closes in this case on December 8, 2011, as set forth in the Stipulation and Order Modifying Pretrial Schedule for “Track One” Direct Action Plaintiff and State Attorney General Actions (Dkt. No. 3110, the “Scheduling Order”);

WHEREAS, Electrograph and Stipulating Defendants have conferred regarding the schedule set forth in the Scheduling Order, Electrograph’s document productions in response to discovery requests served by Hitachi Displays, Ltd. and the contemplated depositions of certain former Electrograph employees;

WHEREAS, Electrograph would benefit from additional time to produce responsive documents and Stipulating Defendants would benefit from additional time to conduct depositions after reviewing documents produced by Electrograph;

WHEREAS Electrograph and Stipulating Defendants agree to the extension of the close of fact discovery set forth in the Scheduling Order for the limited purpose of allowing sufficient time for Electrograph to produce additional responsive documents and Stipulating Defendants to take depositions;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel, on behalf of their respective clients, Electrograph, on the one hand, and Stipulating Defendants on the other hand, as follows:

1. The fact discovery cutoff date of December 8, 2011 in the above-captioned matter, as set forth in the Scheduling Order, is extended for the limited purpose of the aforementioned document productions and depositions;

2. The deadline for Electrograph to produce responsive documents to discovery requests served by Hitachi Displays, Ltd. is extended to January 15, 2012; and

3. The deadline for Stipulating Defendants to take the depositions of former Electrograph employees is extended to February 15, 2012.

Dated: December 6, 2011

By: /s/ Kent M. Roger

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FILER'S ATTESTATION

I, Kent M. Roger, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order. In compliance with General Order 45.X.B, I hereby attest that Kevin McCann, Christopher Nedeau, Melvin Goldman, Robert Wick, Hugh Bangasser, John Grenfell, John Chung, Paul Eyre and Philip Iovieno concur in this filing.

/s/ Kent M. Roger

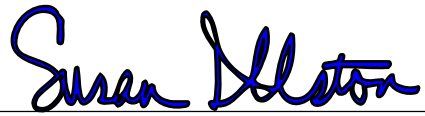
Kent M. Roger

Attorneys for Defendants Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi Electronic Devices (USA), Inc.

[PROPOSED] ORDER

Pursuant to the parties' stipulation set forth above and pursuant to Rule 6-1(a) of the Civil
Local Rules, IT IS SO ORDERED.

Dated: December ~~12~~, 2011

By 
HON. SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE